1 2 3 4 5 6	Hendron Law Group Lance J. Hendron, Esq. Nevada Bar #11151 625 S. Eighth Street Las Vegas, NV 89101 p. 702-710-5555 f. 702-710-8888 lance@hlg.vegas Attorney for Defendant, Charles Parr (6)	
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA	
9	***	
10	UNITED STATES OF AMERICA,	CASE NO. 2:19-cr-0133-APG-VCF
11	Plaintiff,	
12	VS.	
13	MIRIAM ELIZABETH SUAREZ-	STIPULATION AND ORDER TO
14	CONTRERAS (1), aka "Ella" aka "Liz",	CONTINUE SENTENCING (FIRST
15	RAMIRO RAMIREZ-BARAJAS (2),	REQUEST)
16	aka "Sergio", ROBERTO BLANCAS-MATA (3),	
17	aka "Carlos Delgado", RAHDSMA HENDERSON (4), aka "Weezy"	
18	STEPHEN LLOYD (5), CHARLES PARR (6), aka "Charles	
19	Magnuson", DOUG STUMPF (7),	
20	BRIAN SCARBOROUGH (8),	
21	RENEA BARNES (9), aka "Renea Valdez", QUENTIN ARMSTRONG (10),	
22	CIPRIANO PINEDA-ACEDO (11), JOSE GUILLERMO TELLO-ALBARRAN	
23 24	12), and MARTHA PEDRAZA-ZAMORA (13),	
25	Defendants.	
26	Detendants.	
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IT IS HEREBY STIPULATED AND AGREED by and between Melanee Smith, Assistant United States Attorney, counsel for the United States of America, and Lance J. Hendron, Esq., counsel for Defendant Charles Parr (6) that the sentencing currently scheduled for January 18, 2023 at the hour of 3:30 p.m., be vacated and continued to a date and time more convenient to the court but not less than forty-five (45) days from the current sentencing setting.

This Stipulation is entered into for the following reasons:

- 1. The parties agree to the continuance;
- 2. Defendant is currently out of custody and does not object to the continuance;
- 3. Defendant was recently released from the hospital and his oldest son recently passed away, he is respectfully requesting additional time to assist with his recovery and additional time to deal with the grief of his son's passing;
- 4. The parties are continuing to work on, and gather materials relating to sentencing;
- 5. Additionally, denial of this requests for continuance could result in a miscarriage of justice.
- 6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. \$3161(h)(7)(A), when considering the factors under 18 U.S.C. \$\$3161(h)(7)(B) and 3161(h)(7)(B)(iv).
- 7. The additional time requested herein is not sought for purposes of delay and the denial of this request for continuance could result in a miscarriage of justice.
- 8. For all the above-stated reasons, the ends of justice would be best served by the continuance of the sentencing.

9. This is the first request for a continuance of sentencing.

Dates this 9th day of May, 2023.

JASON FRIERSON UNITED STATES ATTORNEY

/s/ Melanee Smith
MELANEE SMITH

Assistant United States Attorney

For Defendant Charles Parr (6)

/s/ Lance J. Hendron

Lance J. Hendron, Esq.

UNITED STATES DISTRICT COURT 1 **DISTRICT OF NEVADA** 2 UNITED STATES OF AMERICA, CASE NO. 2:19-cr-0133-APG-VCF 3 4 Plaintiff, 5 VS. 6 MIRIAM ELIZABETH SUAREZ-CONTRERAS 7 (1), aka "Ella" aka "Liz", RAMIRO RAMIREZ-BARAJAS (2), 8 aka "Sergio", 9 ROBERTO BLANCAS-MATA (3), aka "Carlos Delgado", 10 RAHDSMA HENDERSON (4), aka "Weezy" STEPHEN LLOYD (5), 11 CHARLES PARR (6), aka "Charles 12 Magnuson", DOUG STUMPF (7), 13 BRIAN SCARBOROUGH (8), RENEA BARNES (9), aka "Renea Valdez", 14 **QUENTIN ARMSTRONG (10),** 15 CIPRIANO PINEDA-ACEDO (11), JOSE GUILLERMO TELLO-ALBARRAN 16 12), and MARTHA PEDRAZA-ZAMORA (13), 17 Defendants 18 19 FINDINGS OF FACTS, CONCLUSIONS OF LAW AND ORDER 20 Based on the pending Stipulation of counsel, and good cause appearing therefore, the court 21 hereby finds that: 22 23 /// 24 /// 25 /// 26

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CONCLUSIONS OF LAW

- 1. The parties agree to the continuance;
- 2. Defendant is currently out of custody and does not object to the continuance;
- 3. Defendant was recently released from the hospital and his oldest son recently passed away, he is respectfully requesting additional time to assist with his recovery and additional time to deal with the grief of his son's passing;
- 4. The parties are continuing to work on, and gather materials relating to sentencing;
- 5. Additionally, denial of this requests for continuance could result in a miscarriage of justice.
- 6. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A), when considering the factors under 18 U.S.C. §§3161(h)(7)(B) and 3161(h)(7)(B)(iv).
- 7. The additional time requested herein is not sought for purposes of delay and the denial of this request for continuance could result in a miscarriage of justice.
- 8. For all the above-stated reasons, the ends of justice would be best served by the continuance of the sentencing.
- 9. This is the first request for a continuance of sentencing.

The ends of justice are served by granting said continuances and outweigh the best interest of the public and the Defendants' right to a speedy trial, since the failure to grant aid continuance would be likely result in a miscarriage of justice as it would deny the parties herein sufficient time, and the opportunity within which to effectively and thoroughly prepare and file pretrial motions, responses, and replies, and prepare for trial taking into account the exercise of due diligence.

ORDER

IT IS HEREBY ORDERED that the Sentencing in this matter scheduled for January 18th, 2023, at the hour of 3:30 p.m., is hereby vacated and continued to the <u>23rd</u> day of <u>March</u>, 2023, at the hour of 1:30 p.m., in Courtroom <u>6C</u>.

United States District Court Judge DATED: January 10, 2023